

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

JANE DOE, a minor, by and through her
mother and next friend, MOTHER DOE,

CASE NO.: 1:23-cv-23004-WPD

Plaintiff,

v.

ACADEMIR CHARTER SCHOOLS, INC.,
and SUPERIOR CHARTER SCHOOL
SERVICES, INC.,

Defendants.

**PROPOSED ORDER GRANTING MOTION TO PROCEED ANONYMOUSLY
AND MOTION FOR ENTRY OF PROTECTIVE ORDER**

THIS CAUSE is before the Court on the Plaintiff's Unopposed Motion to Proceed Anonymously and Motion for Entry of Protective Order (the "Motion") (DE 22) filed October 19, 2023. Good cause having been shown, it is hereby ORDERED AND ADJUDGED THAT:

1. Protection of Identity: Throughout the duration of this case, Plaintiff shall be permitted to proceed under the pseudonym "Jane Doe" in all filings, proceedings, and any related matters in this Court to protect her identity and personal privacy.

2. Redaction: Any and all documents filed with the Court that contain or would reveal the real name or personal details of Jane Doe, including any identifying information of Jane Doe's relatives, whether directly or indirectly, shall be redacted to remove such details or be filed under seal.

3. Limitations of Disclosure: Parties, their attorneys, and any individual or entity receiving information in the course of this litigation are prohibited from disclosing the real name or any personal details of Jane Doe to any third party without the written consent of Jane Doe or

further order of this Court. Counsel for Defendants may disclose Jane Doe's identity to the Defendants, their agents, and to any experts retained in this case, but only to the minimum extent necessary to litigate this action.

4. *In Camera* Review: Should a dispute arise concerning the disclosure of identifying information or the confidential nature of any such information, the unredacted documents must be submitted to the Court for *in camera* review.

5. Return or Destruction of Confidential Information: At the conclusion of this litigation, all parties and non-parties in possession of unredacted documents or information revealing the identity of Jane Doe shall either return those documents to the party that produced them or certify their destruction, unless otherwise agreed by the parties or ordered by the Court.

6. Breach of Order: Any party who inadvertently breaches this Order by filing into the Court record a document that contains Jane Doe's identity shall, upon being notified of the breach, take immediate action to have the offending document withdrawn from the Court record and/or replaced with a properly redacted version of the document. Any intentional violation of this Order may result in sanctions, including Contempt of Court.

7. Other Protective Measures: Nothing in this Order shall preclude any party from seeking further or additional protective measures from the Court as necessary.

ORDERED and ADJUDGED in Chambers in Miami-Dade County, Florida, on this ____ day of _____ 2023.

THE HONORABLE WILLIAM P. DIMITROULEAS
UNITED STATES DISTRICT JUDGE

Copies Furnished to All Counsel of Record